

1 MR. HILL: Yeah.

2 JUDGE CHACHKIN: Which was to help minorities
3 economically in private business.

4 MR. HILL: And there could be no greater help than a
5 television station.

6 JUDGE CHACHKIN: A television station which is a
7 commercial television station, which is -- sells spots and
8 presumably has revenue.

9 MR. HILL: Sir, at that point I'd like to suggest
10 that I might have a little bit more experience in my community
11 as to what would be helpful and in my community, a
12 religiously-owned -- because we're basically a religious
13 community, a religiously-owned station was and is a tremendous
14 blessing and I -- one of my first statements was, when do we
15 hurry up and payoff Trinity so we can -- so it can be ours.

16 JUDGE CHACHKIN: I understand that, sir, are you --
17 go ahead, counsel.

18 BY MR. SHOOK:

19 Q What, if anything, Reverend Hill, did you know about
20 the history of National Minority TV at the time that you were
21 congratulating Dr. Crouch?

22 A Well, I knew that TBN had assisted it to coming into
23 being and I took it just as a personal -- I took it as -- with
24 personal gratitude that out of all the minority businesses
25 across this country, SBA and everything else and I understand

1 that's not FCC, that have been strung out as wasted material
2 and wasted money, here is one that it appears was going to be
3 successful and I was filled with gratitude.

4 Q All right, now, I'm trying to explore the specifics
5 of your knowledge as to this point. Let's focus on the time.
6 From your testimony, it would appear we're talking about a
7 period of some five years ago which would be 1987, 1988,
8 somewhere in there and what is it that you knew specifically
9 about National Minority TV at that time other than the fact
10 that, one, it existed and two, that it came into being as a
11 result of some action taken by TBN persons?

12 A And that action was expertise and money.

13 Q Well, okay, aside from the money, what -- well, what
14 are we talking about here at this point, what expertise and
15 what money?

16 A Sir, I have been exposed to a lot of things but I
17 wouldn't know nowhere to begin on how to get a television
18 station going.

19 Q Well, sir, the focus of my question and just maybe
20 I'm not communicating well in terms of what I want to hear
21 from you, but what I'm trying to find out is what specifically
22 you knew about National Minority TV when you --

23 A Before I became a member.

24 Q Yes, sir.

25 A That there was a station in Portland in its name.

1 Q Okay, sir --

2 A That the majority of board of directors were
3 minorities, that there was a station in Portland in its name
4 and some others and that there were to be some others and that
5 the basic funding was a loan from Trinity to Minority TV.

6 Q All right, and so you understood this some time
7 prior to the time you became a board member.

8 A Yes.

9 JUDGE CHACHKIN: But isn't -- you also were aware,
10 were you not, that although the station existed in Portland,
11 that the board of NMTV did not include a single minority
12 member from the Portland area, the community which the station
13 was supposed to service, did that -- did you know that?

14 MR. HILL: No, I didn't know that but that was not
15 -- that wouldn't have been it is not a problem to me even now.

16 JUDGE CHACHKIN: You don't think it's important that
17 the persons who were most familiar with the needs of minority
18 in Portland would be those community leaders who live in
19 Portland?

20 MR. HILL: Yes, and one of the things I pointed to
21 immediately were people in Portland who should be brought in
22 as advisory board members.

23 JUDGE CHACHKIN: But not members of the board.

24 MR. HILL: No.

25 (Tape change.)

1 JUDGE CHACHKIN: But when you say minorities in
2 broadcasting, you've mentioned MESBIC for one thing --

3 MR. HILL: Yes.

4 JUDGE CHACHKIN: Are you aware that MESBIC had
5 funded many broadcast stations that applicants who were
6 minority-controlled or minority-owned?

7 MR. HILL: Yes, I'm aware and I'm aware that most of
8 them fail.

9 JUDGE CHACHKIN: Fail for what reason?

10 MR. HILL: They didn't have the expertise of running
11 television stations.

12 JUDGE CHACHKIN: What's the basis of that knowledge?

13 MR. HILL: Well, I have served in positions where I
14 would be exposed to that.

15 JUDGE CHACHKIN: What stations are you aware of
16 which was funded by MESBIC which failed?

17 MR. HILL: Well, I'm not aware that the one in Los
18 Angeles that just failed was funded by MESBIC but I know it
19 just failed.

20 JUDGE CHACHKIN: Which one is that you're talking
21 about?

22 MR. HILL: That's the Black Workshop.

23 JUDGE CHACHKIN: Well, that had nothing to do with
24 MESBIC, that was a non-profit, it wasn't --

25 MR. HILL: Well, as a matter of fact, I'll go

1 further, I don't know of a MESBIC that had a station that they
2 have actually funded and that it has gone through. If so, I
3 would extend the same congratulations to them.

4 JUDGE CHACHKIN: Are you saying you're not aware
5 within the last five years that the Commission has licensed
6 stations which are controlled by minorities or owned by
7 minorities?

8 MR. HILL: Oh, I'm aware, I'm aware, yes.

9 JUDGE CHACHKIN: And you're not contending that
10 they've all failed, have you?

11 MR. HILL: No, but I'm attending that quite a few
12 have and quite a few have been released -- now, here's another
13 thing you mentioned a word, issued license. Quite a few have
14 been issued license and have gone no further.

15 JUDGE CHACHKIN: What's the basis of that knowledge?

16 MR. HILL: The Urban League's report.

17 JUDGE CHACHKIN: What does the Urban League report
18 state?

19 MR. HILL: The Urban League report states that.

20 JUDGE CHACHKIN: States what?

21 MR. HILL: That many license have been issued and
22 are available -- as a matter of fact one -- the list that I
23 originally asked for when I came on by saying we want to buy
24 more and more and more low-powered, there is quite a long list
25 of stations that had license that they have not gone forward.

1 JUDGE CHACHKIN: But these are commercial stations
2 we're talking about because of economic conditions they may
3 have failed, is that correct?

4 MR. HILL: Well, okay, I cannot say they are all
5 really just stations, no.

6 JUDGE CHACHKIN: Go ahead, sir.

7 BY MR. SHOOK:

8 Q At this period of time and now, we're talking about
9 before you became a board member of NMTV, what understanding,
10 if any, did you have as to what money had been put forth by
11 TBN for NMTV?

12 A I didn't have the amount, I had just that it was
13 funded.

14 Q There was some money but you didn't know how much.

15 A Some money but I had no idea.

16 Q And did you know the name of the predecessor
17 organization of National Minority TV?

18 A No.

19 Q So if I speak of Translator TV, Inc. that means
20 absolutely nothing to you.

21 A No, sir.

22 Q And you would know absolutely nothing about the
23 activities of Translator TV, Inc. between 1980 when it was
24 formed and the time you first heard about NMTV?

25 A No, sir.

1 Q Now, when you first heard about NMTV, did you know
2 who the directors were?

3 A No.

4 Q Do you know Reverend David Espinoza?

5 A Yes, I know of him by reputation but I did not know
6 he was a board member.

7 JUDGE CHACHKIN: Now, was it your belief, sir, when
8 you made the statement about when you were in the private
9 sector of initiative and you congratulated Dr. Crouch that it
10 was your belief that the entity which is now known as NMTV had
11 just come into existence?

12 MR. HILL: No, sir, that wasn't my belief, I -- as I
13 said, I had known of it prior to being a board meeting but as
14 of --

15 JUDGE CHACHKIN: I'm talking about five years ago
16 when you first congratulated Dr. Crouch, when you first heard
17 about Minis -- Minority Television, I congratulated Dr. Crouch
18 so was it your belief that that was -- had just come into
19 existence?

20 MR. HILL: No, sir, I knew of it before I was
21 elected to the board, before I congratulated him, I knew it
22 existed because that's the basis of my congratulations, that I
23 had heard about it.

24 JUDGE CHACHKIN: Well, when did you believe it first
25 came into existence?

1 MR. HILL: Several years before I came on the board.

2 JUDGE CHACHKIN: Well, could you give us an
3 approximate year?

4 MR. HILL: I came on the board in 1992, I believe
5 that '92 or '91 -- I would have known about it by '88, I would
6 have known about it.

7 JUDGE CHACHKIN: So that's when you thought it came
8 into existence in '88?

9 MR. HILL: Yes, sir.

10 JUDGE CHACHKIN: Go ahead --

11 MR. HILL: And that's when the knowledge of its
12 existence began to spread about.

13 BY MR. SHOOK:

14 Q Now, you referred to a packet of information or an
15 informational packet that was sent to you prior to your
16 becoming a board member of NMTV and there are a number of
17 things that were noted there and I just want to make sure I
18 have them all. You received a financial statement, you
19 received articles of incorporation, you received by-laws, you
20 received brief biographies of Dr. Crouch and Mrs. Duff --

21 A As board members.

22 Q -- and Reverend Aguilar.

23 A Aguilar, yes.

24 Q Now, was there anything else that you received
25 outside of those things that we've just gone through?

1 A I don't recall any.

2 Q Well, for example, had you received minutes of any
3 meetings?

4 A No, no, not in that first package, no.

5 Q The financial information that you had received, it
6 was one statement, was it for one year?

7 A It was for the year prior to.

8 Q So with of your joining being October of 1991, the
9 financial --

10 A It would have been the '90th.

11 Q -- was the 1990 audited financial statement?

12 A Yes -- I'm almost certain it would have been the
13 '90th.

14 Q So you had information only for the year 1990 and no
15 other year?

16 A Yes.

17 Q Did you know what position Jane Duff held at Trinity
18 Broadcasting Network when you became a board member of
19 National Minority?

20 A Well, I knew she was employed, I knew she worked
21 there in the office with Dr. Crouch because in many times in
22 going out for broadcasting purposes I'd meet her there but I
23 didn't know her -- the extent of her involvement.

24 Q So, in other words, you didn't know what she did?

25 A No.

1 Q And you didn't know what her day-to-day
2 responsibilities were.

3 A No.

4 Q And you didn't know how many corporations she may
5 have been involved in other than Trinity Broadcasting Network
6 and National Minority TV.

7 A That's right.

8 Q Prior to the time you became a board member of NMTV,
9 had it come to your attention or was it discussed with you how
10 many board meetings Reverend Aguilar had and had not attended?

11 A No.

12 JUDGE CHACHKIN: Well, let me ask you this, do you
13 know today how many corporations that Ms. Duff is involved in?

14 MR. HILL: No.

15 MR. SHOOK: Sir, at the time you became a board
16 member --

17 JUDGE CHACHKIN: Well, do you know to this day more
18 information about what Ms. Duff does for TBN?

19 MR. HILL: Yes.

20 JUDGE CHACHKIN: What more do you know about Ms.
21 Duff's involvement with TBN?

22 MR. HILL: Well, she is very active as an assistant
23 to the president.

24 JUDGE CHACHKIN: What does she do as assistant, do
25 you know what her role is as assistant to the president?

1 MR. HILL: All right, what I have seen and what I
2 have observed, she does receive important issues and makes
3 recommendations and if at a board meeting or in a discussion
4 and I'm often there, I've heard him say, be sure that we get
5 this off to station so and so and station so and so. So she
6 would be, as my assistant she'd be a right-hand. I think
7 she's very close to the administration of TBN.

8 JUDGE CHACHKIN: Go ahead.

9 BY MR. SHOOK:

10 Q Did you review any affiliation agreement that
11 existed between National Minority and Trinity and at the point
12 in time at which you joined there would have been only one,
13 that being the Portland station?

14 A No, I didn't. No, I didn't.

15 Q Reverend, when you joined the National Minority
16 board, at that point in time, National Minority had one
17 licensed facility -- full-powered facility, that being the
18 Portland, Oregon station, what understanding, if any, did you
19 have as to the number of full-power commercial stations that
20 National Minority could hold licenses for?

21 A I had no information as to how many number -- how
22 many they could get license from. Second of all, I had no
23 information as to the definition between low-power and high-
24 power or whatever.

25 Q So in other words --

1 JUDGE CHACHKIN: Full power.

2 MR. HILL: Full power.

3 BY MR. SHOOK:

4 Q -- as far as you were concerned, a television
5 station was a television station.

6 A Is a television station and I wanted to grab all I
7 could get for minorities.

8 Q Now, this may have been covered by Mr. Cohen but --
9 and if it is, I apologize. Did you know that TBN had from the
10 inception of National Minority and its predecessor, Translator
11 TV, provided accounting services to NMTV?

12 A Yes.

13 Q You did. And you had obtained that knowledge from
14 whom?

15 A From the discussion when we dis -- well, let me
16 clarify that, I knew that whatever functioning we were doing
17 business-wise, we were being assisted by TBN, that being --
18 which was -- I was most concerned about technical assistance,
19 how to approach the FCC and get more licensed and the
20 bookkeeping and etcetera.

21 Q Did you know at the time you -- when you joined the
22 board of NMTV whether any amounts loaned by NMTV or loaned by
23 TBN to NMTV or expended by TBN on NMTV's behalf were evidenced
24 by any notes executed by NMTV?

25 A No, I didn't know that, I couldn't -- I can't say I

1 -- because I didn't see it, I didn't see it aside, I did make
2 the assumption because TBN is quite astute in its business.

3 JUDGE CHACHKIN: You assumed there were notes --
4 there were documents --

5 MR. HILL: Yes.

6 JUDGE CHACHKIN: But you never saw any.

7 MR. HILL: I didn't see that --

8 JUDGE CHACHKIN: And you didn't ask to see it.

9 MR. HILL: No, I didn't.

10 BY MR. SHOOK:

11 Q Has it ever come to your attention that beginning in
12 1984 and continuing at least into 1987 TBN was receiving
13 contacts from persons who wished to assign their permits for
14 low-power television stations but there is nothing to show
15 that TBN was referring any such contacts to National Minority
16 TV or its predecessor, Translator TV?

17 A I knew about the first, I'm not acquainted with the
18 second. I knew about the first, that many were offering their
19 stations and what have you to be fully developed by TBN and
20 what have you.

21 Q You were aware of that.

22 A I was aware of that. I was not aware of that they
23 were not offering them to Minority TV or the other one.

24 Q Nor were you aware that TBN had made its contacts
25 known or available to National Minority or its predecessor

1 organization, Translator TV?

2 A No.

3 Q Did you ever become aware that TBN and not
4 Translator TV, National Minority's predecessor was buying and
5 building low-power stations in 1986 notwithstanding that Jane
6 Duff, a Translator TV director, was in charge of TBN's low-
7 power operations?

8 A No, I was not aware, I was not aware of that.

9 MR. TOPEL: May I have one moment, Your Honor.

10 JUDGE CHACHKIN: Yes, we'll go off the record.

11 (On the record.)

12 BY MR. SHOOK:

13 Q Did you ever become aware that in 1988 and 1989 NMTV
14 had chosen to file and prosecute low-power applications for
15 Wilmington, Delaware; Hartford, Connecticut; Columbus, Ohio;
16 and Salt Lake City, Utah rather than build a low-power station
17 in Houston, Texas for which it had a construction permit?

18 A No, sir, I was not aware of that.

19 Q Did you know that in 1988 and 1989 or should I -- I
20 should preface that, did you ever become aware that 1988 and
21 1989 NMTV chose to build a low-power station in Fresno but not
22 in Houston?

23 A No, sir, I was not aware.

24 Q When you joined the NMTV board in 1991, were you
25 aware of any plan by NMTV to break away from TBN?

1 A Well, I was told that.

2 Q And who told you?

3 A I was told that by Jane Duff and by Dr. Crouch --

4 Q And what --

5 A -- that there would come a time when Minority
6 Television could walk on its own and I think one of my first
7 utterances as recorded by the minutes that we should set a
8 time on that and that we should do everything we could to pay
9 off what we owed TBN so that we can go on. Now, when I said
10 that, I didn't mean to suggest any hostility between the two
11 but I just wanted that. Ours is not ours until it's ours and
12 --

13 Q So what you're suggesting by your testimony is that
14 when the indebtedness of NMTV to TBN was paid off that that
15 would be your understanding of NMTV breaking away?

16 A Not breaking away but standing on its own to an
17 extent, we still might choose Paul Crouch as president, in my
18 opinion, until we got everything paid off, till we walked down
19 the road a little bit further, got a few more stations if
20 possible. I wouldn't want to really be involved if I didn't
21 have that expertise.

22 Q Well, my question is, when you joined the board,
23 outside of what you just told us, was there any plan to break
24 away?

25 A I don't know of any official document that would say

1 that other than what I said in the minutes.

2 Q Now, subsequently -- subsequent to your joining, are
3 you aware of any plan outside of the repayment of the debt --

4 A No.

5 Q -- to break away?

6 A No.

7 Q When you joined the NMTV board, were you aware of
8 any plan by NMTV to ask Paul Crouch to resign from the board
9 of NMTV?

10 A No.

11 Q Subsequently, have you become aware of any plan by
12 NMTV --

13 A No.

14 Q -- to ask Paul Crouch to resign from the board?

15 A No.

16 Q Was it ever explained to you that so long as Paul
17 Crouch remained on the board of NMTV that NMTV might be
18 limited in any way in terms of the number of full-power
19 commercial television stations it could own?

20 A No.

21 Q Now, were you aware when you joined the board in
22 October of '91 that NMTV had held permits and/or licenses from
23 the Federal Communications Commission since January 1988?

24 A No.

25 Q What was your understanding as to when NMTV had

1 first acquired any permits or licenses from the FCC?

2 A I don't think I ever asked that question, when they
3 first required that license.

4 Q Well, what I'm thinking if is, when you became a
5 board member in 1991, did you have any understanding as to how
6 long National Minority TV, NMTV had been a licensee of the
7 FCC?

8 A No.

9 Q So it could have been two years, it could have been
10 ten years for all you know?

11 A Yes, for all knew and practical purp -- my knowledge
12 of the station was about a five-year period but it could have
13 been longer than that and --

14 Q And by "the station" you're thinking solely of
15 Portland, Oregon?

16 A Actually I didn't know about Portland so much as I
17 knew about that there was an organization, Minority Television
18 with controlling board members that was buying up stations. I
19 didn't know a lot about Portland. I knew we had an
20 affiliation with it. I have since learned that we own it. I
21 knew that we owned down in Odessa somewhere.

22 Q Well, let me take you back --

23 A And I could not name to you today the low-powered
24 stations that we may own now.

25 Q Let me take you back to October of '91 when you

1 became a board member. My question is, what was your
2 understanding when you joined the board as to what licenses or
3 permits NMTV held?

4 A I didn't have any understanding when I joined the
5 board.

6 Q Now, if I were to tell you that NMTV had filed and
7 prosecuted low-power construction permit applications for
8 Messina, New York; Temple, Texas; Lake Charles, Louisiana;
9 Panama City, Florida; Syracuse, New York; Scranton,
10 Pennsylvania; Geneva, New York; Charlottesville, Virginia;
11 Knoxville, Tennessee and Richmond, Virginia, would that be
12 news to you?

13 A It would be news to me but it would be good news.

14 Q Did you have any knowledge that any applications had
15 been filed by National Minority TV to these places?

16 A No, not to any of those cities, no.

17 Q Assume for the sake of this question that those
18 markets that I just listed are markets in which National
19 Minority has an application which had it filed at one time, do
20 you have any knowledge as to what programming was going to be
21 aired over those markets?

22 A Well, if they were following any instructions that I
23 have heard discussed in the board, the model would be
24 Portland, Oregon and that would include a minority advisory
25 board, that would include programming from TBN such as

1 carrying the three-hour national program and that would
2 include any other programs that we could negotiate with TBN
3 that they -- that the community itself would say that we'd
4 like to see this on our program.

5 Q Am I to infer from the answers to the questions that
6 you've just given me that you did not have any say in which
7 particular markets National Minority would file a low-power
8 application for?

9 A No, I didn't.

10 Q You did not?

11 A No, I didn't.

12 Q Now, I'd like you to refer to Bureau Exhibit 376, I
13 believe -- no, 377, excuse me.

14 A My own testimony on page --

15 JUDGE CHACHKIN: No, no, we're talking about Bureau
16 Exhibit, the Volume 6. That's this one, it's right over
17 there.

18 MR. HILL: Okay, let me look at it.

19 JUDGE CHACHKIN: He has Volume 6.

20 MR. HILL: Okay.

21 JUDGE CHACHKIN: 376 did you say, 377?

22 MR. SHOOK: 377.

23 JUDGE CHACHKIN: 377.

24 MR. HILL: Okay. I have to go back, I have Volume 7
25 here, I --

1 JUDGE CHACHKIN: Oh, here's Volume 7, okay.

2 MR. HILL: I got it.

3 JUDGE CHACHKIN: The special meeting of October 2,
4 1991, is that where you want to put --

5 MR. SHOOK: Okay.

6 MR. HILL: 3 --

7 JUDGE CHACHKIN: 77.

8 BY MR. SHOOK:

9 Q Yes, the meeting in which you were elected. Oh, sir
10 --

11 A I have it.

12 Q -- I apologize, I have directed you to the wrong
13 list, the minutes that I want you to refer to are the annual
14 meeting minutes of January 14, 1992 and those are reflected in
15 Bureau Exhibit 386, I apologize.

16 A 386.

17 Q Yes, sir.

18 A I have it.

19 Q Now, I'd like you to focus on the second page, the
20 second to the last full paragraph there. It refers to a
21 motion that you made.

22 A Yes.

23 Q That the president and secretary be empowered to
24 seek out and acquire low-power and full-power stations, do you
25 see that?

1 A Yes.

2 Q Now, did your motion limit NMTV only to filing
3 applications for construction permits or did your motion call
4 for NMTV to buy available low-power permits and licenses?

5 A My motion sent them out to buy and get in our name
6 and purchase and cause them to start operating every station
7 they could possibly do so.

8 MR. SHOOK: Very good. Mr. Topel, could you place
9 before the witness Exhibit 105, Tab K.

10 JUDGE CHACHKIN: What is that, what is it?

11 MR. SHOOK: It's a list of low-power television
12 stations that are licensed to National Minority TV and it also
13 includes applications that were filed.

14 JUDGE CHACHKIN: Now, what are you showing the
15 witness, 105, Tab what?

16 MR. SHOOK: K.

17 JUDGE CHACHKIN: K. The witness has it in front of
18 him.

19 BY MR. SHOOK:

20 Q Reverend Hill, at the top there in the first line it
21 indicates that National Minority television has a station on
22 Channel 18 in Portland, Maine. Do you see that?

23 A Yes.

24 Q Are you aware of any steps that have been taken to
25 involve minorities in any way in the operations of that low-

1 power television station?

2 A Yeah, our Portland station?

3 Q Sir, that's Portland, Maine.

4 A Portland, Maine. Oh, I'm sorry, no I'm not aware.

5 Q Moving to the second station, it appears to be on
6 Channel 45 in Charleston, West Virginia, you see that?

7 A Yes.

8 Q Are you aware of any steps that have been taken to
9 involve minorities in any way in the operations of that
10 station?

11 A No, I'm not.

12 JUDGE CHACHKIN: Perhaps we could save time if the
13 witness could look at the entire list and answer the same
14 question.

15 MR. SHOOK: Exactly.

16 MR. HILL: The only one that I would know here would
17 be Richmond, Virginia.

18 BY MR. SHOOK:

19 Q And according to this list, just so I can explain it
20 to you that it was an application was filed on April 2, 1993
21 and this document reflects that that license app -- or that
22 construction permit application is pending.

23 A Well, then all I -- I'm confused as to the number of
24 the station, all I know is that we're operating in Richmond
25 and how the community's involved in that station. I'm sorry,

1 I didn't know that was -- we're operating in Richmond.

2 Q And can you explain to us what your understanding is
3 as to who is operating in Richmond, Virginia?

4 A Well, I know that TBN comes on in Richmond, Virginia
5 and that I know pastors who participate, I know programs that
6 are one. For an instant, I know that Dwight Jones and the
7 other pastor has a dialogue of what's important in the
8 community. I know that has something to do with TBN.

9 Q Very good.

10 JUDGE CHACHKIN: That's TBN we're talking about, not
11 NMTV.

12 MR. HILL: Oh, I'm sorry. I was referring to TBN.

13 JUDGE CHACHKIN: So you know that there's TBN
14 programming is being carried by some station in Richmond.

15 MR. HILL: That's right.

16 BY MR. SHOOK:

17 Q Now, in response to a question from Mr. Cohen and I
18 want to direct you back to Bureau Exhibit 386, page 2.

19 A 386, yes.

20 Q I'd like to focus your attention on the last
21 substantive paragraph which appears on the second page, it
22 states "Reverend Hill expressed an interest in acquiring a
23 low-powered station in the Los Angeles area. Mr. May agreed
24 to research the availability of such licenses." Do you see
25 that?

1 A Yes.

2 Q Now, there were some questions and answered from Mr.
3 Cohen on that subject. What I'd like to know is when did Mr.
4 May send you any information on the availability of stations
5 in Los Angeles?

6 A I received information within six weeks after this
7 meeting as to what stations was and what was in Los Angeles.

8 Q So that would have been some time in the winter or
9 early spring of 1992?

10 A Yes.

11 Q Did that information come to you orally or in
12 writing?

13 A No, in writing.

14 Q Have you received any additional information as to
15 -- from that?

16 A No, no, I haven't.

17 Q Now, I'd like to focus your attention on the events
18 that surround the minutes of October 15, 1992 and that would
19 be Bureau Exhibit 405. So that would be in the seventh
20 binder.

21 A Okay.

22 Q Now, there were a number of questions and answers
23 put to you by Mr. Cohen in regard to this matter and I just
24 want to clarify something. Prior to the October 15, 1992
25 meeting you testified that you brought to Dr. Crouch's

1 attention the matters that are reflected in these minutes,
2 that is, the request for a loan to Community Brace.

3 A In the -- yes, loan to Community --

4 Q Now, was your request put to Dr. Crouch that TBN
5 loan the money or that NMTV loan the money?

6 A I wasn't specific in asking who loaned the money.

7 Q Now, at the time of the meeting, October 15, 1992,
8 were you aware of what NMTV's financial situation was?

9 A I had seen an -- wait a minute -- yes, I had seen
10 it.

11 Q So you were aware that at this point NMTV owed
12 millions of dollars to TBN?

13 A Yes.

14 Q Can you explain to me why NMTV is going to loan
15 Community Brace \$1,000,000 when itself is in debt millions of
16 dollars?

17 A Well, of course, I think the decision was that TBN
18 would loan to Minority Television the \$1,000,000 so that they
19 would be in a position to get a bank letter guarantee of
20 \$1,500,000 that we needed so that it would give the
21 appearance, and a good appearance, that a minority group was
22 helping to establish a MESBIC in Los Angeles.

23 Q I think I understand, the difficult that I'm having
24 is that NMTV already owes TBN several millions of dollars at
25 this point. NMTV is now going to borrow another \$1,000,000